

SCANNED

January 3, 2019

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
CLERK'S OFFICE
JANUARY 3, 2019

Your Honor,

Case #1:18-cv-10222

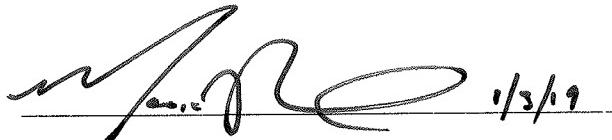
I, Mack Pampley, President of Business Moves Consulting Inc. ask for an extension regarding this case. I appeared and filed for an extension on behalf of business moves pro se on November 30, 2018 so that I would have more time to find counsel in New York for our company. I was also ordered to not file anything further without an attorney.

I have searched exhaustively to find counsel, which is extremely difficult considering that I reside in Mississippi. The fact that the holidays have also slowed this search down has not helped either. There is overwhelming evidence establishing coverage and duty to defend , which Hiscox recognized and has provided defense for many months. I am asking that a default judgment not be ruled in this case given these facts and also this case has a similarly situated defendant who will be filing an answer. I am asking for more time to find counsel in the state of New York.

We have reached out to the Hiscox attorney in an attempt to get more time, and the Hiscox attorney said he was waiting for a response from Hiscox. They seemingly were unavailable to discuss but were available to dismiss the other defendants in the case and were also available to file paperwork seeking a default judgment. Also, we are in the process of exploring settlement with Hiscox. These discussions began during the court ordered settlement conference with Magistrate Freeman in the related action, SDNY case 1:18-cv-05187, which Hiscox attended.

In an effort to see this case in its entirety, we ask for more time to hire counsel in this case and that no default judgment be rendered and /or we receive notice of any hearing on the matter.

Respectfully,



1/3/19

Mack Pampley President

Business Moves Consulting Inc

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